

EXHIBIT 4
Deposition Notice of Keith H. St. John

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

THIS DOCUMENT RELATES TO:

All Actions Naming St. Thomas Outpatient
Neurosurgical Center

MDL No. 2419
Master Dkt. 1:13-md-02419-RWZ

DEPOSITION NOTICE

Please take notice that pursuant to Rule 30 of the Federal Rules of Civil Procedure and MDL Order No. 10 (Document #1426), the Plaintiffs' Steering Committee ("PSC") will take the deposition of Keith H. St. John, MT (ASCP), MS, CIC on Friday, March 11, 2016 at 9:00 a.m., at The Office Jeffrey W. Golan, Barrack, Rodos, Bacine located at 2001 Market Street, Suite 3300, Philadelphia, PA 19103. The deposition will be recorded by stenographical means and by video. A request for records is attached as Exhibit A hereto.

Dated: February 16, 2016

Respectfully submitted,

/s/ Benjamin A. Gastel

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*Plaintiffs' Steering Committee and Tennessee State
Chair*

CERTIFICATE OF SERVICE

I, Benjamin A. Gastel, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: February 16, 2016

/s/ Benjamin A. Gastel

Benjamin A. Gastel

EXHIBIT A

The word "documents" shall be defined to include any kind of written, typewritten, printed or recorded material whatsoever, including without limitation, statements, notes, transcription of notes, memoranda, letters, telefaxes, publications, agreements, pictures, photographs, audio tape recordings, video tape recordings, cassettes, transcriptions of any such recordings, log books, business records, and computer files or electronic data such as e-mails or instant messages.

Pursuant to the Federal Rules of Civil Procedure, this will serve as a request for the Deponent, expert witness Keith H. St. John, MT (ASCP), MS, CIC, to produce the following documents at least seven days prior to his deposition:

1. All documents containing facts or data that he considered in forming his expert opinions.
2. All documents containing facts or data that the underlying party's attorney provided to him and that he considered in forming the opinions to be expressed.
3. Copies of all scholarly literature on which he relied.
4. All exhibits that he intends to use to summarize or support his opinions.
5. All materials relevant to his opinions and his expert report in this case.
6. A list of all publications he authored in the previous 10 years.
7. A list of all other cases in which he has testified as an expert at trial or by deposition within the previous 4 years.
8. All communications relating to compensation for his study or testimony.
9. All non-privileged communications relating to his report.
10. His current resume and curriculum vitae.